



2-SA-ER

January 23, 1976

308 Letter Response; Troy Chemical Corporation, Newark, New Jersey

Director, Enforcement Division
EPA, Region II
26 Federal Plaza
New York, New York 10007

ATTN: Henry Gluckstern, Water Enforcement Branch

THRU: Michael V. Polito, Chief, Emergency Response & Inspection Branch

The enclosed letter indicates that Troy Chemical Company violated 40 CFR, Section 112.3 by failing to prepare and implement an SPCC Plan by the specified deadlines. Also, the materials marked on the third page of Troy Chemical's letter are also considered oils. Consequently, these materials should be included in their SPCC Plan.

It is recommended that Troy Chemical be cited for this violation.

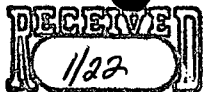
Clark K. Price
Pollution Spills Investigator
Emergency Response Section

Enclosure

SA/ERI:CKPrice:nde:Bldg.209:x548:1/23/76

CONCURRENCES

SYMBOL ▶	SA/ERI	SA/ERI	SA/ERI				
SURNAME ▶	PRICE	ELLIOT	POLITO				
DATE ▶							



ONE AVENUE L • NEWARK, NEW JERSEY 07105



N. J. (201) 589-2500 • N. Y. (212) 349-0181

troy CHEMICAL CORPORATION

January 21, 1976

Environmental Protection Agency
Region II
Edison, New Jersey 08817

Att: Mr. Michael V. Polito, Chief
Emergency Response & Inspection Branch

Gentlemen:

In response to your letter of January 9, we are pleased to supply you with the following information.

1. Yes, we do store oil in containers with a capacity greater than 660 gals.
2. The total above ground oil storage capacity is 24,000 gals.
3. We do not have any underground storage capacity.
4. We have had no spills at any time.
5. We do have a spill prevention control and counter-measure plan. It was certified on March 19, 1975 by Mr. William Litner, L & L Chemical Construction Co., 246 Hackensack St., East Rutherford, N.J. His Professional Engineer's License number is NJ-11437.
6. The plan was fully implemented on the date it was prepared. However, an additional oil storage tank with a capacity of 2,500 gals. is being installed at this time and it will be included in the plan. This new tank will be completely diked and will have the same spill prevention control for any spills as mentioned in the plan.

January 21, 1976

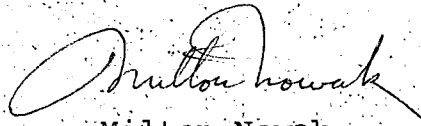
7. The person in charge of production facilities is myself and our Plant Manager is Mr. John Hoffmann. Telephone number for each of us is the company number.

8. We do store products other than oil at our facility and we attach hereto a list of those materials which we either store continuously or on occasion.

Please let us know if there is any further information required by law. You may be assured of our complete cooperation.

Yours truly,

TROY CHEMICAL CORPORATION



Milton Nowak
Vice President

eab
Encls.

Acetic Acid
2-Ethylhexoic acid
Benzol
Methanol
Water

Soybean oil
Defoamer 999*
TP-70B (alkyd resin)
Troymax Lead 24%*
Troymax Lead 36%*
Troymax Calcium 4% *
Troymax Calcium 6% *
Troymax Zirconium 12% *
Manganese 9% *
Mineral spirits (flash point 107°F)
Isopropanol
Nitric Acid
Isobutyl Carbitol

Dipropylene Glycol
Isononanoic Acid
LLBA *

Naphthenic Acid
Tall Oil Fatty Acids
Inkol-O-Solvent (mineral oil)
Monoethanolamine
Ammonium Hydroxide
VMP Naphtha
Super High Flash Naphtha
Propylene Glycol
Caustic soda

* Finished product - Proprietary formulation